

HELBRAUN || LEVEY

August 23, 2021

**VIA ECF**

The Hon. LaShann DeArcy Hall  
United States District Judge  
United States District Court, Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

*Re: Emilee Lord v. Halyards, LLC and Edward Colley,  
Civil Action No.: 21-cv-4416-LDH-TAM*

Your Honor:

This office represents the Defendants in the above referenced matter. I write to ask the Court for an extension of time for my clients to answer, or otherwise move, with respect to Plaintiff's Complaint.

At present time, there is no due date set by the Court as to when Defendants' responsive pleading is due. We respectfully ask the Court to allow my clients to answer, or otherwise move, with respect to Plaintiff's Complaint, by October 11, 2021. Plaintiff's counsel consents to this request. No previous requests for an adjournment have been previously made. The basis for this request is that firm has just been retained by the Defendants. The extension of time will allow me to have a full opportunity to meet and confer with my clients to evaluate Plaintiff's allegations. No dates or deadlines have yet been set by the Court.

Thank you for your consideration.

Regards,

*/s/ Lee Nolan Jacobs*

Lee N. Jacobs